

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

**INDICTMENT FOR VIOLATIONS OF THE FEDERAL  
CONTROLLED SUBSTANCES ACT AND THE FEDERAL GUN CONTROL ACT**

**UNITED STATES OF AMERICA**

\*

**CRIMINAL DOCKET NO:**

**v.**

\*

**SECTION:**

**JIMIYU VERNON**

\*

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**VIOLATION: 21 U.S.C. § 841(a)(1)  
18 U.S.C. § 924(c)**

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The Grand Jury charges that:

**COUNT 1**

On or about February 15, 2008 , in the Eastern District of Louisiana, the defendant, **JIMIYU VERNON**, did knowingly and intentionally possess with the intent to distribute fifty grams or more of cocaine base (“crack”), and a quantity of cocaine hydrochloride, both Schedule II narcotic drug controlled substances in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and (b)(1)(c).

## **COUNT 2**

On or about February 15, 2008 , in the Eastern District of Louisiana, the defendant, **JIMIYU VERNON**, did knowingly possess a firearm, to wit: a Millennium 9mm handgun, serial number TYF02355, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: possession with the intent to distribute cocaine base (“crack”) and cocaine hydrochloride, in violation of Title 21, United States Code, Section 841(a)(1); all in violation of Title 18, United States Code, Section 924(c)(1)(A).

### **NOTICE OF FORFEITURE**

1. The allegations of Count 1 of this indictment is realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 21, United States Code, Section 853.

2. As a result of the offense alleged in Count 1, **JIMIYU VERNON**, shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any and all property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the said violation and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violation alleged in Count 1 of this indictment.

3. If any of the property subject to forfeiture pursuant to Paragraph 2 of this Notice of Forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;

- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property. All in violation of Title 21, United States Code, Section 853.

A TRUE BILL:

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F O R E P E R S O N

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JIM LETTEN #8517  
UNITED STATES ATTORNEY

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JAN MASELLI MANN #9020  
FIRST ASSISTANT UNITED STATES ATTORNEY

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MAURICE E. LANDRIEU, JR. #22104  
ASSISTANT UNITED STATES ATTORNEY

New Orleans, Louisiana  
March 27, 2008